

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

MARRIOTT INTERNATIONAL, INC.,

Plaintiff,

v.

DYNASTY MARKETING GROUP, LLC,
et al.,

Defendants.

Civil Action No. 1:21-cv-00610-AJT/JFA

JOINT MOTION FOR ENTRY OF CONSENT ORDER

Plaintiff Marriott International, Inc. (“Marriott”) and Defendant Rapid Eagle, Inc. d/b/a VoIP Essential (“VoIP Essential”) (collectively, “Parties”), by counsel, hereby jointly move this Court to enter a Consent Order pursuant to a stipulation reached by the Parties.

1. Marriott filed its First Amended Complaint on May 17, 2022, naming, *inter alia*, Defendant VoIP Essential. *See* Dkt. No. 22.

2. Based on good faith negotiations, the Parties have agreed to the terms of the proposed Consent Order attached hereto as Exhibit A, for entry by the Court.

3. Upon entry of the proposed Order, all pending claims asserted against VoIP Essential in this action will be dismissed with prejudice.

WHEREFORE, Plaintiff Marriott and Defendant VoIP Essential respectfully request that this Court grant the Joint Motion for Entry of Consent Order.

Dated: October 5, 2022

MARRIOTT INTERNATIONAL, INC.

By counsel

/s/ Attison L. Barnes, III

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